UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

MEMORANDUM

SUBJECT: Request for Approval of Proposed Plan
Findett OU4 Huster Road Substation
St. Charles, St. Charles County, Missouri

FROM: Clint Sperry, Remedial Project Manager
Site Remediation Branch

Clint Sperry Digitally signed by Clint Sperry Date: 2021.01.20 15:57:26 -06'00'

THRU: Katy Miley, Acting Chief
Site Remediation Branch

TO: Mary P. Peterson, Director
Superfund and Emergency Management Division

Attached for your approval is the Proposed Plan for the Findett/Huster Road Substation site in St. Charles, Missouri. This Proposed Plan identifies the preferred alternatives for cleaning up contaminated groundwater at Findett Operable Unit 4 (OU4) and provides the rationale for these preferences. The Preferred Alternative is Alternative 3 – Enhanced Bio/Groundwater Extraction Treatment System (GETS)/Institutional Controls (ICs). In addition, this Proposed Plan includes summaries of other cleanup alternatives evaluated for use at this site.

The Findett Site is divided into four OUs. OU1 addresses the soil and groundwater contamination on the Findett property. OU2 addresses the soil contamination on the former Cadmus property. OU3 addresses affected groundwater that has migrated off the OU1/OU2 property boundaries. OU4, the subject of this Proposed Plan, addresses source material and groundwater at the Ameren Missouri Huster Road Substation.

OU4 is an active electrical distribution and transmission substation. It was originally constructed in 1963, and with subsequent expansions now encompasses approximately 8 acres. The substation is surrounded by a 12-foot flood protection berm and is fenced with a locking gate. OU4 is situated within the Missouri River alluvial valley where the city of St. Charles receives their drinking water.

Chlorinated solvents were historically used at OU4 for degreasing and metal cleaning. Volatile organic compounds (VOCs), primarily consisting of PCE, trichloroethylene (TCE), *cis*-DCE, and vinyl chloride (VC) have been detected in soil and groundwater at OU4. In addition, chlorinated VOCs (primarily *cis*-DCE and VC) have been detected in groundwater to the north of the substation. In June 2010, VOCs (primarily DCE) were detected in City Well 5, which is located approximately 180-200 feet north of the substation.

Four pilot studies have been completed on and off the substation property. The pre-remedial treatments from the pilot studies have resulted in significant reductions of groundwater contamination and the

ongoing reductive dechlorination of contaminants of concerns (COCs). Current COCs in groundwater are 1,1-dichloroethene, acetone, *cis*-DCE, PCE, toluene, *trans*-1,2-dichloroethene, TCE, and VC. Of the 17 monitoring wells on site, one well is slightly above the maximum contaminant level (MCL) for TCE; two wells exceed the MCL for *cis*-DCE (7,300 µg/L and 12,000 µg/L); and at eight monitoring wells, VC ranged from 3.4 µg/L to 1,900 µg/L. The current area with COC concentrations above MCLs is limited to a small area surrounding Transformer 2 inside the substation.

The Missouri Department of Natural Resources is the support agency and provided consultation to the EPA throughout the pilot study and remedy selection process. State acceptance of the preferred alternative (enhanced bio/GETS/ICs) will be fully determined after the public comment period closes for the Proposed Plan. Any comments received from MDNR will be reviewed and addressed in the Responsiveness Summary. The preference for this preferred alternative could change in response to public comment or new information. Consultation between the EPA and the MDNR will continue throughout this decision process.

Your signature will serve to document the EPA's approval of the Proposed Plan for the Findett/Huster Road Substation site.

APPROVAL

MARY PETERSON

Digitally signed by MARY PETERSON
Date: 2021.01.20 16:46:38 -06'00'

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Mary P. Peterson, Director
Superfund and Emergency Management Division

Attachment